

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

CARMEN LILIA MENDEZ DE VACHON

Plaintiff,

V.

KATHLEEN KILIAN MENDEZ and the
SUCCESSION OF JOSE F. GONZALEZ
ALONSO, composed of JOSE PEDRO
GONZALEZ KILIAN, LARA ELISA
GONZALEZ KILIAN, FRANCISCO JOSE
GONZALEZ KILIAN and JUAN CARLOS
GONZALEZ KILIAN

Defendants

CIVIL NO: 96-1654 (cc)

ACTION FOR:

DECLARATORY JUDGMENT AND
COLLECTION OF MONIES

MOTION TO NAME SPECIAL MASTER

TO THE HONORABLE COURT:

COMES NOW, the parties represented by their attorneys, who respectfully states, alleges and prays:

1. That Plaintiff has moved for the enforcement of the Stipulation of Settlement in this case.
2. That it is requested that Adam McDonough with address on 1519 Ponce de Leon Avenue, First Federal Building, Suite 409, San Juan, Puerto Rico 00909-1713, telephone 787-723-2085, be named Special Master to execute the Deed of Transfer to Plaintiff of Apartment 9-F, Condominium Ambassador, Condado, San Juan, Puerto Rico, in this case.
3. That the notary in the said Deed be authorized to execute same without the

Defendants' social security number as in view of the fact that Plaintiff is the mother of the Defendant and grandmother of Defendants that due to bad family relations Plaintiff is unable to obtain this information.

WHEREOF, it is respectfully requested that Adam McDonough be named Special Master in this case to execute the Deed of Transfer to Plaintiff on behalf of Defendants and that such Deed may be executed without the Defendants' social security number.

In San Juan, Puerto Rico this 21 day of September, 2004.

s/Ronald L. Rosenbaum

Ronald L. Rosenbaum

USDC 114403

Attorney for Plaintiff

LAW OFFICES OF RONALD L. ROSENBAUM

414 Muñoz Rivera Avenue

Suite 7-A

Hato Rey, Puerto Rico 00918

Tel. 787-274-5440

Fax 787-274-5442